



Application GRANTED. The initial pretrial conference currently scheduled for February 2, 2022, is hereby ADJOURNED to **March 23, 2022, at 3:30 p.m.** The Clerk of Court is directed to terminate ECF No. 21.

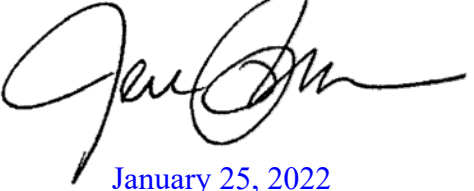
Mark S. Cohen
212 957 7601
mcohen@cohengresser.com

January 25, 2022

BY ECF

Hon. Jesse M. Furman
Thurgood Marshall United States Court House
40 Foley Square
New York, NY 10007

SO ORDERED.



January 25, 2022

Re: P.T., et al. v. The Rockefeller University, No. 21-cv-06740-JMF

Dear Judge Furman:

We represent The Rockefeller University (formerly known as The Rockefeller Institute), of which The Rockefeller University Hospital (formerly known as The Rockefeller Institute for Medical Research) is a center (together, the "University"), in the above-referenced action. We write on behalf of the parties to jointly and respectfully request that the Court adjourn the Initial Pretrial Conference scheduled for February 2, 2022 to March 21, 22, or 23, 2022 or to a convenient time for the Court thereafter. In addition, the parties jointly request that the University's deadline to answer, move, or otherwise respond to the Amended Complaint (Dkt. No. 9, the "Amended Complaint") be extended from January 28, 2022 to March 14, 2022.

The parties make these requests to permit active settlement negotiations to continue without expending resources in the litigation or imposing any burden on the Court. The parties have identified a mutually agreeable timeframe for the adjournment of the conference and the response to the Amended Complaint, which they believe will leave enough additional time to continue productive discussions, while ensuring that the litigation proceeds promptly if the case is not resolved.

The parties have made two prior requests for adjournment of the Initial Pretrial Conference and one prior request for an extension of the University's deadline to respond to the Amended Complaint, which the Court granted (Dkt. Nos. 10, 11, 17, 18). This request for an additional adjournment and extension is needed for the parties to continue the active process of exchanging settlement demands and offers on behalf of their respective clients. There are no other upcoming appearances scheduled before the Court and no other existing deadlines other than the January 27, 2022 deadline for the parties to file a proposed case management plan and joint pre-conference letter in advance of the Initial Pretrial Conference for which the parties seek an adjournment herein.

Thank you for your consideration of these requests.

Respectfully submitted,

/s/ Mark S. Cohen

Mark S. Cohen

CC: All counsel (by ECF and email)